Albano, Emily

From: Cheever, Robert
Sent: Monday, September 08, 2014 8:54 AM
To: Cheever, Robert
Cc: HertzWu, Sara
Subject: Opacity Lotus Notes Archives
Attachments: readymix2.pdf

----- Forwarded by Robert Cheever/R7/USEPA/US on 09/08/2014 08:52 AM -----

From: Bonnie Braganza/R6/USEPA/US@EPA
To: "Air Permit Exchange" <permit@lists.epa.gov>
Date: 11/19/2010 08:39 AM
Subject: Re: [permit] Compliance with short term limits

I would recommend you look at Appendix A for example like the opacity protocol. If the operations are pretty stable in nature then you can establish the protocol for how often the measurement should be done to determine the one hour rate. Also you could require measurements for 10 minutes to be done at different times in the one hour period on a rotating basis eg at 1:00, at 1:10 , 1:20 etc. - just my thoughts

POSITIONS or VIEWS EXPRESSED DO NOT REPRESENT OFFICIAL EPA POLICY

Bonnie Braganza
US EPA Region 6
Air Permits Section
Multimedia Permitting & Planning Division
Phone:214 -665-7340
Fax: 214-665-6762

Remember Life Rewards Actions!
And if you continue to do what you have always done, you will get what you always got!

Re: [permit] Compliance with short term limits

Catherine Penland to: Air Permit Exchange 11/18/2010

Cc: "Air Permit Exchange"

Please respond to "Air Permit Exchange"

If emissions measured are for 10 minutes over one hour but the limit is in lb/hour, how do you determine compliance? Do you just measure 10 minutes of emissions against the lb/hr limitation or do you try to extrapolate that out as if it emitted to 60 minutes? or something else?

Catherine G. Penland

EPA Region 6 - 6PD-R
Phone: (214) 665-7122
Fax: (214) 665-6762
penland.catherine@epa.gov

Re: [permit] Compliance with short term limits

Christopher Razzazian to: Air Permit Exchange 11/18/2010

Please respond to "Air Permit Exchange"

I think we'll need some more background,

are you asking if the limit averaging period is less than one hour, or a case where the emissions measured are for a period of ten minutes?

Thanks for the clarification.

Chris

From: Catherine Penland/R6/USEPA/US@EPA
To: "Air Permit Exchange" <permit@lists.epa.gov>
Date: 11/18/2010 02:52 PM
Subject: [permit] Compliance with short term limits

I think this has gone around before, but I can't find responses.

How do you set/measure or determine compliance with short term limits if the emissions are less than 1 hour, i.e., 10 minutes/hour?

Catherine G. Penland
EPA Region 6 - 6PD-R
Phone: (214) 665-7122
Fax: (214) 665-6762
penland.catherine@epa.gov

Or send a blank email to
leave-1085518-848288.c15a5f1c1872ee86df198e6964368ad6@lists.epa.gov .

You are currently subscribed to permit as: penland.catherine@epamail.epa.gov.
To unsubscribe click here:
https://lists.epa.gov/u?id=848299.e2d0634d35cea87aa593d4cf4fd3ab2b&n=T&l=permit&o=1085526

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----- Forwarded by Robert Cheever/R7/USEPA/US on 09/08/2014 08:52 AM -----

From: PatriciaA Scott/R7/USEPA/US
To: Jon Knodel/R7/USEPA/US@EPA, Robert Patrick/R7/USEPA/US@EPA, Ward Burns/R7/USEPA/US@EPA
Cc: MarkA Smith/R7/USEPA/US@EPA, Hugh McCullough/R7/USEPA/US@EPA, Eric Sturm/R7/USEPA/US@EPA, Robert Webber/R7/USEPA/US@EPA, Robert Cheever/R7/USEPA/US@EPA, Tamara Freeman/R7/USEPA/US@EPA
Date: 12/02/2010 11:03 AM
Subject: Fw: Information related to ICL (pollution controls versus inherent to the process)

FYI
----- Forwarded by PatriciaA Scott/R7/USEPA/US on 12/02/2010 11:01 AM -----

From: Terry Tavener <TTavener@kdheks.gov>

To: PatriciaA Scott/R7/USEPA/US@EPA

Date: 12/02/2010 11:00 AM

Subject: Information related to ICL (pollution controls versus inherent to the process)

Good morning, Pat,

I added ICL Performance Products located in Lawrence, KS to our conference call today. ICL is an inorganic chemical facility that manufactures phosphoric acid and sodium phosphates.

Susana Pjesky is the permitting engineer that is working on their Title V renewal and she prepared for me the below review of the issues.

I've also attached the 2002 EPA letter that provides a determination on pollution controls versus inherent to the process equipment. This letter is mentioned below.

I will review the issues during our conference call this afternoon.

Terry

Terry Tavener
Unit Supervisor - Natural Resources
KDHE Bureau of Air
Air Permitting Section
1000 SW Jackson, Suite 310
Topeka, KS 66612-1366

Please note my new email address: ttavener@kdheks.gov
Work #: 785-296-1581 Fax #: 785-291-3953

Hi Pat,

We would like to request EPA's determination regarding ICL's (Source ID No. 0450013) request for re-evaluation of their facility's fabric filters and wet scrubbers from being classified as "air pollution control equipment" to being classified as "inherent process equipment" ("inherent to the process"), thus, removing the K.A.R. 28-19-501(d) requirements in the renewal of their Class I Operating Permit.

At present, ICL has **five (5) wet scrubbers** and **51 fabric filters** that, according to ICL, meet the "**three (3) criteria**" listed on the EPA's "Criteria for Determining whether Equipment is Air Pollution Control Equipment or Process Equipment" (issued on November 27, 1995). One (1) fabric filter does not meet the said criteria because it is a control device installed as part of the Consent Agreement and Final Order of the Secretary (CAO) issued to ICL on February 26, 2004.

The **five (5) wet scrubbers,** aside from meeting the "**three (3) criteria**", are also "interlocked" (or have mechanical interlocks) to the process, meaning the emissions units that are connected to the wet scrubbers will not run if the wet scrubbers are not running. **Three (3)** out of the five (5) wet scrubbers have history of excessive or abnormal emissions and malfunctions. Below is an excerpt from ICL's e-mail when asked about the history of excessive or abnormal emissions from the said wet scrubbers:

> "…The malfunction typically involves plugging or breaking through of the scrubber pads. As inherent control equipment I don't believe that 501(d) applies. I think that the opacity limitation of 40% dictates the use of the scrubber without needing to impose 501(d)."

The **31** out of the 51 fabric filters that meet the "**three (3) criteria**" are not interlocked (or do not have mechanical interlocks). **Six (6)** of the said 31 fabric filters are connected to emissions units that are located inside the production buildings; while **25** of the said 31 fabric filters are connected on top of tanks. Below is ICL's e-mail explaining scenarios when emissions units (abbreviated as EU in the e-mail) can continuously

run when the fabric filters (abbreviated as CE in the e-mail) are not running:

> "There are different scenarios I can provide. Although there are no interlocks, most of the CE units run continuously. If they are shutdown for scheduled maintenance, the EU's are shut down. If the CE malfunctions, and the repair is minor or can be made in a reasonable amount of time, the EU's will be allowed to operate. Some of the EU's (008, 056, 057,069, 078, 083) are located inside production buildings. If the associated CE malfunctions and the EU continues to operate, no emissions are vented outside, but production areas will get dusty. The remaining EU's are tanks. The CE's also typically run continuously. The only time they recover product is when we are actively transferring material into them. This is a small percentage of the time, making maintenance activities easier to perform. Loading a tank while the EU is down generally does not result in emissions. The CE bags/filters still perform their function of venting the tank while it is being filled."

We e-mailed KDHE's determination to ICL (as shown in the following excerpt):

> *"The following is our determination --- For the purposes of determining the potential-to-emit (PTE), KDHE allows the effect of a control device that is determined to be "inherent to the process" to be taken into account. For the purposes of guaranteeing that the control device will be continuously operating while the associated emission unit is operating and that the control device is being properly operated and maintained, the K.A.R. 28-19-501(d) language are normally included in the permit as federal enforceable requirements. Hence, the K.A.R. 28-19-501(d) language that are already listed in the existing Class I Operating Permit of ICL (and in other existing construction permit/approval/responses issued to ICL) will remain in effect. And again, the control devices that are determined to be "inherent to the process" are given consideration/credit when calculating the PTE of the proposed project."*

Below is ICL's response to our determination:

> *"We have reviewed the regulations and your proposal. We agree that for the purposes of calculating PTE, the effects of inherent process equipment can be taken into account. In a letter to the National Ready Mix Concrete Association dated July 10, 2002, EPA stated that "the effect of the equipment or practices can be taken into account in calculating potential emissions regardless of whether enforceable limitations are in effect."(see attached letter). Therefore, the permit should not impose "enforceable limitations" such as continuous operation, proper operation or maintenance program requirements on "process equipment". Furthermore, K.A.R. 28-19-501(d) specifically refers to "air pollution control equipment", not process equipment (see excerpt below). That being said, we believe that inherent process equipment should be entirely excluded from the Title V permit."*
>
> **28-19-501. Operating permits; emissions limitations and pollution control equipment for class I and class II operating permits; conditions.** (a) The owner or operator of an emissions unit or stationary source may request an operational permit restriction or a permit condition requiring the use of air pollution control equipment, or both, which reduce the potential-to-emit of an emissions unit or stationary source…
> (d) Except as otherwise authorized by the Kansas air quality regulations or the operating permit issued to the source, air pollution control equipment identified in an operating permit shall reduce the potential-to-emit of an emissions unit or stationary source, either alone or in conjunction with an operational restriction, if the owner or operator of the emission unit or stationary source:
> (1) continuously operates the air pollution control equipment while operating the associated emissions unit or units;
> (2) develops, implements and maintains onsite a written maintenance plan to assure proper operation of the air pollution control equipment; and

The letter from EPA dated July 10, 2002 (attached) and also the November 27, 1995 letter (mentioned above) seem to have two ideas that are contradicting to each other (please see the highlighted phrases) and we also

want to clarify them with you:

> One part of the letter states: *"For purposes of calculating a source's potential to emit, it is necessary to consider the effect of air pollution control equipment. Current EPA regulations and policy allow air pollution control equipment to be taken into account* ***if enforceable requirements are in place*** *requiring the use of such air pollution control equipment."*
>
> Another part of the letter states: *"If .....equipment should be considered as an inherent part of the process, then the effect of the equipment or practices can be taken into account in calculating potential emissions* ***regardless of whether enforceable imitations are in effect****."*

Thank you,

_____

(See attached file: readymix2.pdf)
----- Forwarded by Robert Cheever/R7/USEPA/US on 09/08/2014 08:52 AM -----

From: PatriciaA Scott/R7/USEPA/US
To: Robert Cheever/R7/USEPA/US@EPA
Date: 02/09/2011 11:01 AM
Subject: Fw: PostRock Fireside 205 0045 Title V comments

---

fyi
----- Forwarded by PatriciaA Scott/R7/USEPA/US on 02/09/2011 11:01 AM -----

From: Mike Parhomek <mparhome@kdheks.gov>

To: PatriciaA Scott/R7/USEPA/US@EPA

Date: 02/09/2011 10:58 AM

Subject: RE: PostRock Fireside 205 0045 Title V comments

Fireside amine unit
It appears to me the amine unit was not subject to anything other than 20% opacity at the time it was installed years ago and the emissions were under the KDHE reportable level. Therefore we would not issue an approval or permit since the emissions were so small.
I found another Postrock source (Rettman station- ID 205 0052) that has an amine unit (0.72 MMBtu/hr) reboiler and the NOx emission were 0.3 tons/year and the CO emission were 0.26 tons/year. I can fax the calcs if you wish.
The consultant has indicated to me at the time the amine unit at Fireside was added, CO2 wasn't a regulated pollutant. They are removing CO2 from coal bed methane so there were no VOC emissions.

-----Original Message-----
From: Scott.PatriciaA@epamail.epa.gov [mailto:Scott.PatriciaA@epamail.epa.gov]
Sent: Tuesday, February 08, 2011 10:31 AM
To: Marian Massoth

Cc: Mike Parhomek
Subject: PostRock Fireside Title V comments

Marian,

Attached is a copy of the comments for PostRock Fireside. The hard copy is in the mail. Please send a copy of the final permit, statement of basis, and response to comments once the final permits is issued.

Thanks,

Pat

(See attached file: PostRock Fireside T5.pdf)

----- Forwarded by Robert Cheever/R7/USEPA/US on 09/08/2014 08:52 AM -----

From: Christopher Razzazian/R8/USEPA/US
To: Kirt Cox/RTP/USEPA/US@EPA
Cc: Alex Chen/R7/USEPA/US@EPA, Alexis North/R8/USEPA/US@EPA, Amy Caprio/R3/USEPA/US@EPA, Ana Oquendo/R4/USEPA/US@EPA, Andre Daugavietis/R5/USEPA/US@EPA, Andrew Chew/R9/USEPA/US@EPA, Andrew Parks/R4/USEPA/US@EPA, Andrew Porter/R4/USEPA/US@EPA, Angela Catalano/R7/USEPA/US@EPA, Angelia Blackwell/R4/USEPA/US@EPA, Argie Cirillo/R2/USEPA/US@EPA, Art Hofmeister/R4/USEPA/US@EPA, Beth Valenziano/R5/USEPA/US@EPA, Bonnie Braganza/R6/USEPA/US@EPA, Brandi Jenkins/R4/USEPA/US@EPA, Brent Maier/R9/USEPA/US@EPA, Bryan Holtrop/R10/USEPA/US@EPA, Charmagne Ackerman/R5/USEPA/US@EPA, Christopher Ajayi/R8/USEPA/US@EPA, CindyJ Nolan/R4/USEPA/US@EPA, Claudia Smith/R8/USEPA/US@EPA, Constantine Blathras/R5/USEPA/US@EPA, Cyntia Steiner/R9/USEPA/US@EPA, Dan Meyer/R10/USEPA/US@EPA, Dana Skelley/R7/USEPA/US@EPA, Daniel Boehmcke/R3/USEPA/US@EPA, Danny Marcus/R5/USEPA/US@EPA, Dave Bray/R10/USEPA/US@EPA, Dave Campbell/R3/USEPA/US@EPA, David Garcia/R6/USEPA/US@EPA, David Neleigh/R6/USEPA/US@EPA, David Wampler/R9/USEPA/US@EPA, Deborah Jordan/R9/USEPA/US@EPA, Dinesh Senghani/R6/USEPA/US@EPA, Donald Dahl/R1/USEPA/US@EPA, Donald Law/R8/USEPA/US@EPA, Donna Mastro/R3/USEPA/US@EPA, Doug Hardesty/R10/USEPA/US@EPA, Doug Neeley/R4/USEPA/US@EPA, Eaton Weiler/R5/USEPA/US@EPA, Ellen Rouch/R4/USEPA/US@EPA, Emlyn Velez-Rosa/R3/USEPA/US@EPA, Eric Sturm/R7/USEPA/US@EPA, Eric Wortman/R8/USEPA/US@EPA, Erick Ihlenburg/R2/USEPA/US@EPA, Gaetano LaVigna/R2/USEPA/US@EPA, Gary Bertram/R7/USEPA/US@EPA, Genevieve Damico/R5/USEPA/US@EPA, Gerald Degaetano/R2/USEPA/US@EPA, Gerallyn Duke/R3/USEPA/US, Gracy Danois/R4/USEPA/US@EPA, Gregg Worley/R4/USEPA/US@EPA, Guy Donaldson/R6/USEPA/US@EPA, Hans Buenning/R8/USEPA/US@EPA, Himanshu Vyas/R3/USEPA/US@EPA, Hugh McCullough/R7/USEPA/US@EPA, Ida McDonnell/R1/USEPA/US@EPA, Ivan Lieben/R9/USEPA/US@EPA, James Purvis/R4/USEPA/US@EPA, Jane Woolums/R5/USEPA/US@EPA, Jeanhee Hong/R9/USEPA/US@EPA, Jeff Cahn/R5/USEPA/US@EPA, Jeff Kenknight/R10/USEPA/US@EPA, Jennifer Abramson/R3/USEPA/US@EPA, Jennifer Lewis/R4/USEPA/US@EPA, Joe Terriquez/R7/USEPA/US@EPA, Joel Huey/R4/USEPA/US@EPA, Jon Knodel/R7/USEPA/US@EPA, Jonah Staller/R8/USEPA/US@EPA, Jonathan Averback/DC/USEPA/US@EPA, Joseph Lapka/R9/USEPA/US@EPA, Joshua Olszewski/R6/USEPA/US@EPA, Joshua Tapp/R7/USEPA/US@EPA, Julie Vergeront/R10/USEPA/US@EPA, Kara Christenson/R9/USEPA/US@EPA, Karl Mangels/R2/USEPA/US@EPA, Katherine Hoag/R9/USEPA/US@EPA, Kathleen Cox/R3/USEPA/US@EPA, Kathleen Forney/R4/USEPA/US@EPA, Kathleen Paser/R8/USEPA/US@EPA, Kathleen Root/R3/USEPA/US@EPA, Kathleen Stewart/R9/USEPA/US@EPA, Katie Romero/R8/USEPA/US@EPA, Kaushal Gupta/R5/USEPA/US@EPA, Kelly Fortin/R4/USEPA/US@EPA, Keri Powell/R4/USEPA/US@EPA, Kirt Cox/RTP/USEPA/US@EPA, Laura Cossa/R5/USEPA/US@EPA, Laura Yannayon/R9/USEPA/US@EPA, Laurie Kral/R10/USEPA/US@EPA, Leonardo Ceron/R4/USEPA/US@EPA, Lionel MacKenzie/R2/USEPA/US@EPA, Lisa Hanlon/R7/USEPA/US@EPA, Louise Gross/R5/USEPA/US@EPA, Lucinda Watson/R6/USEPA/US@EPA, Lynda Crum/R4/USEPA/US@EPA, Lynde Schoellkopf/R6/USEPA/US@EPA, Makeba Morris/R3/USEPA/US, Manny Aquitania/R9/USEPA/US@EPA, MarkA Smith/R7/USEPA/US@EPA, Mary McHale/R2/USEPA/US@EPA, Michael Barra/R6/USEPA/US@EPA, Mike Gordon/R3/USEPA/US@EPA, Mike Owens/R8/USEPA/US@EPA, Natasha Hazziez/R7/USEPA/US@EPA, Neil Bigioni/R3/USEPA/US@EPA, Nick Stone/R6/USEPA/US@EPA, Nina Kocourek/R10/USEPA/US@EPA, Omer Shalev/R9/USEPA/US@EPA, Pamela Blakley/R5/USEPA/US@EPA, Pat Nair/R10/USEPA/US@EPA, PatriciaA Scott/R7/USEPA/US@EPA, Paul Wentworth/R3/USEPA/US@EPA, Perry Pandya/R3/USEPA/US@EPA, Rachel Rineheart/R5/USEPA/US@EPA, Ragan Tate/DC/USEPA/US@EPA, Randy Terry/R4/USEPA/US@EPA, Ray Chalmers/R3/USEPA/US@EPA, Richard Angelbeck/R5/USEPA/US@EPA, Richard Barrett/R6/USEPA/US@EPA, Robert Cheever/R7/USEPA/US@EPA, Robert Patrick/R7/USEPA/US@EPA, Robert Smolski/R3/USEPA/US@EPA, Robert Todd/R6/USEPA/US@EPA, Robert Webber/R7/USEPA/US@EPA, Roger Kohn/R9/USEPA/US@EPA, Rosalyn Hughes/R4/USEPA/US@EPA, Roylene Cunningham/R10/USEPA/US@EPA, Sabrina Argentieri/R5/USEPA/US@EPA, Sam Portanova/R5/USEPA/US@EPA, Sara HertzWu/R7/USEPA/US@EPA, Sara Laumann/R8/USEPA/US@EPA, Sarah LaBoda/R7/USEPA/US@EPA, Scott Miller/R4/USEPA/US@EPA, Sean Lakeman/R4/USEPA/US@EPA, Shaheerah Kelly/R9/USEPA/US@EPA, Sharon McCauley/R3/USEPA/US, Stan Kukier/R4/USEPA/US@EPA, Stanley Spruiell/R6/USEPA/US@EPA, Steve Marquardt/R5/USEPA/US@EPA, Suilin Chan/R2/USEPA/US@EPA, Susan Kraj/R5/USEPA/US@EPA, Tamara Freeman/R7/USEPA/US@EPA, Tim Williamson/R1/USEPA/US@EPA, Umesh Dholakia/R2/USEPA/US@EPA, Vera Kornylak/R4/USEPA/US@EPA, Victoria Parker-Christensen/R8/USEPA/US@EPA, Ward Burns/R7/USEPA/US@EPA, William Wagner/R5/USEPA/US@EPA, Yolanda Adams/R4/USEPA/US@EPA
Date: 06/21/2011 11:14 AM
Subject: Re: CANCELLING Today's Title V Permits Call

Hi Group

I kind of forgot that today would be the Tuesday for us. Sorry for not getting an agenda item out yesterday. Since we are not going to have the call I would like to take this opportunity to let you all know that the Pawnee Power Plant title V petition has moved on to the HQ level for Administrator Jackson's signature by June 30th. We are denying all claims except for two that concern opacity monitoring or a lack thereof.

I'll keep the group posted when it goes final. Region 8 will then have two nearly identical petitions for two power plants

owned by the same company.

In addition to this issue I want to make everyone aware that the same petitioner has now commented on a power plant permit in WY (WYGEN II). The meat of his comments were that the six adjacent power plants at the Wyodak Complex near Gillette, WY, should be aggregated for PSD and TV purposes. The commenter (WildEarth Guardians - Jeremy Nichols) submitted his comments to the state of WY the day after the comment period closed. Therefore, WDEQ did not respond to his comments and explained by letter that his letter was received by certified mail the day after the period closed. WEG has informed me that they will be submitting a petition on this permit. The EPA comment period ended 6/6 and the final permit was signed on 6/7/2011.

Thanks so much and let me know if anyone has any interest in knowing anything about what I've mentioned here, or otherwise.

Christopher Razzazian
Region 8 Permit Team
(303)312-6648

Kirt Cox---06/21/2011 08:35:02 AM---Despite a diligent search, we have been unable to find people who are ready and willing to discuss t

From: Kirt Cox/RTP/USEPA/US
To: Alex Chen/R7/USEPA/US@EPA, Alexis North/R8/USEPA/US@EPA, Amy Caprio/R3/USEPA/US@EPA, Ana Oquendo/R4/USEPA/US@EPA, Andre Daugavietis/R5/USEPA/US@EPA, Andrew Chew/R9/USEPA/US@EPA, Angela Catalano/R7/USEPA/US@EPA, Angelia Blackwell/R4/USEPA/US@EPA, Argie Cirillo/R2/USEPA/US@EPA, Art Hofmeister/R4/USEPA/US@EPA, Beth Valenziano/R5/USEPA/US@EPA, Bonnie Braganza/R6/USEPA/US@EPA, Brandi Jenkins/R4/USEPA/US@EPA, Brent Maier/R9/USEPA/US@EPA, Bryan Holtrop/R10/USEPA/US@EPA, Charmagne Ackerman/R5/USEPA/US@EPA, Christopher Ajayi/R8/USEPA/US@EPA, Christopher Razzazian/R8/USEPA/US@EPA, CindyJ Nolan/R4/USEPA/US@EPA, Claudia Smith/R8/USEPA/US@EPA, Constantine Blathras/R5/USEPA/US@EPA, Cyntia Steiner/R9/USEPA/US@EPA, Dan Meyer/R10/USEPA/US@EPA, Dana Skelley/R7/USEPA/US@EPA, Daniel Boehmcke/R3/USEPA/US@EPA, Danny Marcus/R5/USEPA/US@EPA, Dave Bray/R10/USEPA/US@EPA, Dave Campbell/R3/USEPA/US@EPA, David Garcia/R6/USEPA/US@EPA, David Neleigh/R6/USEPA/US@EPA, David Wampler/R9/USEPA/US@EPA, Deborah Jordan/R9/USEPA/US@EPA, Dinesh Senghani/R6/USEPA/US@EPA, Donald Dahl/R1/USEPA/US@EPA, Donald Law/R8/USEPA/US@EPA, Donna Mastro/R3/USEPA/US@EPA, Doug Hardesty/R10/USEPA/US@EPA, Doug Neeley/R4/USEPA/US@EPA, Eaton Weiler/R5/USEPA/US@EPA, Ellen Rouch/R4/USEPA/US@EPA, Emlyn Velez-Rosa/R3/USEPA/US@EPA, Eric Sturm/R7/USEPA/US@EPA, Eric Wortman/R8/USEPA/US@EPA, Erick Ihlenburg/R2/USEPA/US@EPA, Gaetano LaVigna/R2/USEPA/US@EPA, Gary Bertram/R7/USEPA/US@EPA, Genevieve Damico/R5/USEPA/US@EPA, Gerald Degaetano/R2/USEPA/US@EPA, Gerallyn Duke/R3/USEPA/US, Gracy Danois/R4/USEPA/US@EPA, Gregg Worley/R4/USEPA/US@EPA, Guy Donaldson/R6/USEPA/US@EPA, Hans Buenning/R8/USEPA/US@EPA, Himanshu Vyas/R3/USEPA/US@EPA, Hugh McCullough/R7/USEPA/US@EPA, Ida McDonnell/R1/USEPA/US@EPA, Ivan Lieben/R9/USEPA/US@EPA, James Purvis/R4/USEPA/US@EPA, Jane Woolums/R5/USEPA/US@EPA, Jeanhee Hong/R9/USEPA/US@EPA, Jeff Cahn/R5/USEPA/US@EPA, Jeff Kenknight/R10/USEPA/US@EPA, Jennifer Abramson/R3/USEPA/US@EPA, Jennifer Lewis/R4/USEPA/US@EPA, Joe Terriquez/R7/USEPA/US@EPA, Joel Huey/R4/USEPA/US@EPA, Jon Knodel/R7/USEPA/US@EPA, Jonah Staller/R8/USEPA/US@EPA, Jonathan Averback/DC/USEPA/US@EPA, Joseph Lapka/R9/USEPA/US@EPA, Joshua Olszewski/R6/USEPA/US@EPA, Joshua Tapp/R7/USEPA/US@EPA, Julie Vergeront/R10/USEPA/US@EPA, Kara Christenson/R9/USEPA/US@EPA, Karl Mangels/R2/USEPA/US@EPA, Katherine Hoag/R9/USEPA/US@EPA, Kathleen Cox/R3/USEPA/US@EPA, Kathleen Forney/R4/USEPA/US@EPA, Kathleen Paser/R8/USEPA/US@EPA, Kathleen Root/R3/USEPA/US@EPA, Kathleen Stewart/R9/USEPA/US@EPA, Katie Romero/R8/USEPA/US@EPA, Kaushal Gupta/R5/USEPA/US@EPA, Kelly Fortin/R4/USEPA/US@EPA, Keri Powell/R4/USEPA/US@EPA, Kirt Cox/RTP/USEPA/US@EPA, Laura Cossa/R5/USEPA/US@EPA, Laura Yannayon/R9/USEPA/US@EPA, Laurie Kral/R10/USEPA/US@EPA, Leonardo Ceron/R4/USEPA/US@EPA, Lionel MacKenzie/R2/USEPA/US@EPA, Lisa Hanlon/R7/USEPA/US@EPA, Louise Gross/R5/USEPA/US@EPA, Lucinda Watson/R6/USEPA/US@EPA, Lynda Crum/R4/USEPA/US@EPA, Lynde Schoellkopf/R6/USEPA/US@EPA, Makeba Morris/R3/USEPA/US, Manny Aquitania/R9/USEPA/US@EPA, MarkA Smith/R7/USEPA/US@EPA, Mary McHale/R2/USEPA/US@EPA, Michael Barra/R6/USEPA/US@EPA, Mike Owens/R8/USEPA/US@EPA, Natasha Hazziez/R7/USEPA/US@EPA, Neil Bigioni/R3/USEPA/US@EPA, Nick Stone/R6/USEPA/US@EPA, Omer Shalev/R9/USEPA/US@EPA, Pamela Blakley/R5/USEPA/US@EPA, Pat Nair/R10/USEPA/US@EPA, PatriciaA Scott/R7/USEPA/US@EPA, Paul Wentworth/R3/USEPA/US@EPA, Perry Pandya/R3/USEPA/US@EPA, Rachel Rineheart/R5/USEPA/US@EPA, Ragan Tate/DC/USEPA/US@EPA, Randy Terry/R4/USEPA/US@EPA, Ray Chalmers/R3/USEPA/US@EPA, Richard Angelbeck/R5/USEPA/US@EPA, Richard Barrett/R6/USEPA/US@EPA, Robert Cheever/R7/USEPA/US@EPA, Robert Patrick/R7/USEPA/US@EPA, Robert Smolski/R3/USEPA/US@EPA, Robert Todd/R6/USEPA/US@EPA, Robert Webber/R7/USEPA/US@EPA, Roger Kohn/R9/USEPA/US@EPA, Rosalyn Hughes/R4/USEPA/US@EPA, Roylene Cunningham/R10/USEPA/US@EPA, Sabrina Argentieri/R5/USEPA/US@EPA, Sam Portanova/R5/USEPA/US@EPA, Sara HertzWu/R7/USEPA/US@EPA, Sara Laumann/R8/USEPA/US@EPA, Sarah LaBoda/R7/USEPA/US@EPA, Scott Miller/R4/USEPA/US@EPA, Sean Lakeman/R4/USEPA/US@EPA, Shaheerah Kelly/R9/USEPA/US@EPA, Sharon McCauley/R3/USEPA/US, Stan Kukier/R4/USEPA/US@EPA, Stanley Spruiell/R6/USEPA/US@EPA, Steve Marquardt/R5/USEPA/US@EPA, Suilin Chan/R2/USEPA/US@EPA, Susan Kraj/R5/USEPA/US@EPA, Tamara Freeman/R7/USEPA/US@EPA, Tim Williamson/R1/USEPA/US@EPA, Umesh Dholakia/R2/USEPA/US@EPA, Vera Kornylak/R4/USEPA/US@EPA, Victoria Parker-Christensen/R8/USEPA/US@EPA, Ward Burns/R7/USEPA/US@EPA, William Wagner/R5/USEPA/US@EPA, Yolanda Adams/R4/USEPA/US@EPA, Mike Gordon/R3/USEPA/US@EPA, Nina Kocourek/R10/USEPA/US@EPA, Andrew Porter/R4/USEPA/US@EPA, Andrew Parks/R4/USEPA/US@EPA
Date: 06/21/2011 08:35 AM
Subject: CANCELLING Today's Title V Permits Call

Despite a diligent search, we have been unable to find people who are ready and willing to discuss their work. As a result, we have cancelled the session that had been scheduled for 1:00 EDT today.

Please consider contributing to our next session, scheduled for Tuesday, July 19.

* * * * *

----- Forwarded by Robert Cheever/R7/USEPA/US on 09/08/2014 08:52 AM -----

From: Viorica Petriman/R2/USEPA/US@EPA
To: "Air Permit Exchange" <permit@lists.epa.gov>
Date: 07/06/2011 03:34 PM
Subject: [permit] BACT -Municipal Waste Combustor Metals

Currently, Region 2 is reviewing a new Municipal Waste Incinerator project that is a brand new PSD source, and the applicant proposes to emit (among other pollutants) the following:

- 97 TPY of Particulate matter (filterable + condensable)
- 97 TPY of PM_{10} (filterable + condensable)
- 97 TPY of $PM_{2.5}$ (filterable + condensable)

Municipal waste combustor metals

- 0.046 TPY of Cadmium (Cd)
- 0.31 TPY of Lead (Pb), and
- 0.07 TPY of Mercury (Hg

_____
Total: 0.426 TPY

According to 40 CFR 52.21 (b) (23) (i), **municipal waste combustor metals** (**measured as particulate matter**)**,** is a PSD pollutant, and has a significant emission rate of **15 TPY**.

Based on the Municipal Waste Combustor -NSPS subpart Eb, the **municipal waste combustor (MWC) metals** seem to include: particulate matter, Cd, Pb, Hg, and opacity. The NSPS Eb standard establishes individual emission limits for particulate matter, Cd, Pb and Hg. Additionally, the NSPS Eb standard prescribes Method 5 for determining compliance with particulate matter, and Method 29 for determining compliance with Cd, Pb, and Hg, individually.

Questions:

1. What is the meaning of “measured as particulate matter”? Does this mean that we only set one limit for MWC metals and determine compliance with Method 5? What about PM condensable for MWC metals?

2. Would the proposed project, which has a PTE of particulate matter (which includes condensable) of 97 TPY (> 15 TPY), while the individual or combined metal(s) PTE at 0.426 TPY is less than 15 TPY, be subject to PSD review for the MWC metals?

3. If the project is subject to PSD for MWC metals, can we have a separate BACT emission limit for each MWC metal (Cd, Lead, and Hg) that is more stringent than NSPS Eb, and a separate BACT emission limit for the MWC metals (measured as particulate matter)?

Thank you. Any input you can provide will be greatly appreciated.

Viorica Petriman, Environmental Engineer
US EPA Region 2
Air Programs Branch
Air Permitting Section
290 Broadway, 25th Floor
New York , NY 10007
Phone: 212-637-4021
Fax:212-637-3901

----- Forwarded by Robert Cheever/R7/USEPA/US on 09/08/2014 08:52 AM -----

From: Kathleen Cox/R3/USEPA/US@EPA
To: "Air Permit Exchange" <permit@lists.epa.gov>
Date: 07/19/2011 07:12 AM
Subject: Re: [permit] BACT -Municipal Waste Combustor Metals

Hi Viorica,
Since MWC metals are included because there is an NSPS (and an emissions guideline) for MWCs, I believe you have to go back to the standard itself to define these terms. MWC metals are defined in 60.51b as "metals and metal compounds emitted in the exhaust gases from municipal waste combustor units". The same section defines particulate matter as "total particulate matter emitted from municipal waste combustor units as measured by EPA reference Method 5." I find use of the term "total" interesting since Method 5 only measures filterable, but I also think for metals, this would be appropriate.

So, I would conclude that you have to regulate them as the aggregate of MWC metals, as defined in the regulation, and the appropriate measure is filterable particulate matter. This means that an MWC could trigger for PM, as its own PSD pollutant, at 25 tpy and for the same measured pollutant (PM) as a surrogate for MWC metals at 15 tpy.

Kathleen (Anderson) Cox, Associate Director
Office of Permits and Air Toxics (3AP10)
U. S. EPA - Region III
1650 Arch Street
Phila. PA 19103
ph: (215) 814-2173
fax: (215) 814-2134
email: cox.kathleen@epa.gov

Please note that my name and email address have changed!

From:	Viorica Petriman/R2/USEPA/US@EPA
To:	"Air Permit Exchange" <permit@lists.epa.gov>
Cc:	permit@lists.epa.gov
Date:	07/12/2011 11:33 AM
Subject:	[permit] BACT -Municipal Waste Combustor Metals

Hi Gerallyn:

Thank you for forwarding R2 question to the Region III air incinerator expert. Here is my response to the issues/ questions raised by Jim T from Region III.

Based on the project description previously included with my question, the MW Incinerator project is a brand new PSD source.

The project's PTE of NOx, CO, and SO_2 exceeds the applicable threshold of 100 TPY. Furthermore, the project would be also subject to PSD review for VOC, Fluorides, PM, PM_{10}, PM $_{2.5}$, Sulfuric acid mist, Municipal waste combustor organics, Municipal waste acid gases, and (*presumably)* for Municipal waste combustor metals (measured as particulates) since the particulates PTE is greater than 15 TPY.

The project's emissions may contain a variety of metals such as Pb, Cd, Hg, Arsenic, and Beryllium. However, with the exemption of Pb, (that is elemental Pb with 0.6 TPY threshold), the other metals **are not regulated** under the PSD regulations. While Hg, Arsenic, and Beryllium **had been regulated under PSD**, they **were removed** from the PSD pollutants list in 1990 or 1991.

The project proposes to emit 0.046 TPY of Cd, 0.31 TPY of Pb, 0.07 TPY of Hg, 0.003 TPY of Beryllium, and 0.002 TPY of Arsenic. The project's total metals PTE: 0.431 TPY.

Currently, the PSD regulated pollutant is "Municipal waste combustor **metals** (**measured as particulates**)" with a significant threshold of 15 TPY. The project's PTE of particulates is 97 TPY.

R2 is trying to find out whether the project triggers PSD review for municipal waste combustor metals and more importantly if we have the authority to establish BACT limits for each metal, independently.

Thanks, Viorica

Viorica Petriman, Environmental Engineer
US EPA Region 2
Air Programs Branch
Air Permitting Section
290 Broadway, 25th Floor
New York , NY 10007
Phone: 212-637-4021
Fax:212-637-3901

Gerallyn Duke/R3/USEPA/US-----Gerallyn Duke/R3/USEPA/US wrote: -----
To: "Air Permit Exchange" <permit@lists.epa.gov>
From: Gerallyn Duke/R3/USEPA/US
Date: 07/12/2011 07:46AM
Subject: Fw: [permit] BACT -Municipal Waste Combustor Metals

I forwarded the question from Viorica in R2 to the Region III air incinerator expert. I hope you find this helpful.
Gerallyn Duke
EPA Region III
Office of Permits & Air Toxics 3AP10
1650 Arch Street
Philadelphia, PA 19103

215-814-2084

|Re: Fw: [permit] BACT -Municipal Waste Combustor Metals |
>----------|

Gerallyn,

It has been a while (around 2000) since I was involved in PSD applicability determinations. I'm not sure how PSD rule applicability has changed since that time. Nevertheless, given below are my responses to your questions. I hope you and R2 find the responses helpful.

1. What is the meaning of “measured as particulate matter”? Does this mean that we only set one limit for MWC metals and determine compliance with Method 5? What about PM condensable for MWC metals?

Response: PM control is a surrogate means and/or indicator for metals control. By effectively controlling PM, there is a collateral benefit in controlling most metal emissions, except Hg, which is highly volatile. The 129 rules for incinerators are clear. PM compliance is determined by M5 and heavy metals (Hg, Cd, and Pb) compliance is determined by Method 29. The compliance method exceptions include the use of EPA approved alternative methods (e.g., PM and multi-metals CEMS).

2. Would the proposed project, which has a PTE of particulate matter (which includes condensable) of 97 TPY (> 15 TPY), while the individual or combined metal (s) PTE at 0.426 TPY is less than 15 TPY, be subject to PSD review for the MWC metals?

Response: I believe the answer is "No.", even assuming the new incinerator facility is classified as "major" for one regulated attainment or non criteria pollutant. Based on experience, incinerator pollutants, other than PM, that might trigger the major source threshold (100 tpy) are CO, NOx, and SO2 What are the annual emissions rates for each of these pollutants? Assuming one pollutant triggers the major source threshold, and considering the projected PSD metal emission rates (Pb - 0.13 tpy, and Hg - 07 tpy), BACT requirements for these metals would not be triggered. The significant emission rates under 40 CFR 52.21(b)(23) for these metals are: Pb - 0.6 tpy, and Hg - 0.1 tpy. Obviously, the answer is still "No." if the source is considered minor.

3. If the project is subject to PSD for MWC metals, can we have a separate BACT emission limit for each MWC metal (Cd, Lead, and Hg) that is more stringent than NSPS Eb, and a separate BACT emission limit for the MWC metals (measured as particulate matter)?

Response: It is not clear how the project would be subject to PSD after considering the response to question 2 above. Nevertheless, assuming the project is subject to PSD for MWC metals, under 40 CFR 52.21(b)(23), the PSD metals are Pb, Hg, beryllium, and arsenic. Cd is not subject to a specific BACT determination. No information is given on projected emission rates for Be and As, in order to determine BACT applicability.

One 2010 BACT determination in R3 for a new 4000 tpd (4x 1000) Energy Answers facility in Baltimore, MD, established metal related emission

limits more stringent than the current subpart Eb limiitations for PM, Hg, and Pb.

From the R2 information provided, the new facility will remain below the 100 tpy threshold for PM, and the 40 CFR 52.21(b)(23) significant thresholds for Pb and Hg.

In a related matter, it's important to know that EPA is drafting a revised LMWC 129 MACT proposal, to be published in the FR, perhaps this fall. [Check with Warren Johnson, OAQPS, on the estimated proposal date.] A new facility, which commences construction after the revised rule proposal date, will be subject to possibly more stringent subpart Eb MACT requirements for PM, Pb, Cd, and Hg than what is required now.

Let me know if you need a clarification on any response.

Jim T.

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| From: |
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|Gerallyn
Duke/R3/USEPA/US
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| To: |
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|Jim
Topsale/R3/USEPA/US@EPA
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|07/07/2011 07:15
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|Fw: [permit] BACT -Municipal Waste Combustor
Metals |
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I'm not sure you are on this list serve, but here is a question for you. :-)
Gerallyn Duke
EPA Region III
Office of Permits & Air Toxics 3AP10
1650 Arch Street
Philadelphia, PA 19103
215-814-2084

----- Forwarded by Gerallyn Duke/R3/USEPA/US on 07/07/2011 07:14 AM -----

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| From: |
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|Viorica Petriman/R2/USEPA/US@EPA
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| To: |
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|"Air Permit Exchange" <permit@lists.epa.gov>
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| Date: |
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|07/06/2011 04:34 PM
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| Subject: |
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|[permit] BACT -Municipal Waste Combustor Metals
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Thank you. Any input you can provide will be greatly appreciated.

Viorica Petriman, Environmental Engineer
US EPA Region 2
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Air Permitting Section
290 Broadway, 25th Floor
New York , NY 10007
Phone: 212-637-4021
Fax:212-637-3901

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Or send a blank email to leave-1154455-1024419.8b0ed3014763d5bf908357448c8e3912@lists.epa.gov .
----- Forwarded by Robert Cheever/R7/USEPA/US on 09/08/2014 08:52 AM -----

From: Eric Sturm/R7/USEPA/US@EPA
To: "Air Permit Exchange" <permit@lists.epa.gov>
Cc: Christopher Razzazian/R8/USEPA/US@EPA
Date: 07/13/2011 05:04 PM
Subject: [permit] Pawnee T5 Order Signed

Response to WildEarth Guardian's petition for the Xcel Energy Pawnee power station operating permit was recently signed. It's available on the R7 petition database. Thanks for sending Chris. Link to the order and summary of the issues below...

http://www.epa.gov/region07/air/title5/petitiondb/petitions/xcel_pawnee_response2010.pdf

Permit fails to ensure compliance with:
1) PSD requirements
a) EPA NOV constitutes noncompliance - denied
b) Major mods have occurred - denied
c) CDPHE response comments were inadequate - denied
2) Boiler PM limits
a) Does not require actual monitoring - denied
b) Stack testing is too infrequent - denied
c) CDPHE cannot rely on CAM to meet T5 monitoring - denied
d) CDPHE inappropriately rejected PM CEMS - denied
3) Other PM limits and monitor fugitives - denied
4) 20% opacity limits under NSPS Y - denied
5) PM limits and monitoring for specified point sources
a) does not require sufficient monitoring - denied
b) vague and unenforceable provisions - denied
c) sufficient recordkeeping/reporting must be added - granted
d) Annual Method 9 and other monitoring is inadequate - denied
6) CAA 112(j) - denied
7) PSD requirements for CO2

a) CDPHE did not assess CO2 as subject to regulation - denied
b) Significant increase of CO2 occurred - denied

----- Forwarded by Robert Cheever/R7/USEPA/US on 09/08/2014 08:52 AM -----

From: Viorica Petriman/R2/USEPA/US@EPA
To: "Air Permit Exchange" <permit@lists.epa.gov>
Cc: permit@lists.epa.gov
Date: 07/12/2011 10:33 AM
Subject: [permit] BACT -Municipal Waste Combustor Metals

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Viorica Petriman, Environmental Engineer
US EPA Region 2
Air Programs Branch
Air Permitting Section
290 Broadway, 25th Floor
New York , NY 10007
Phone: 212-637-4021
Fax:212-637-3901

Gerallyn Duke/R3/USEPA/US-----Gerallyn Duke/R3/USEPA/US wrote: -----

To: "Air Permit Exchange" <permit@lists.epa.gov>
From: Gerallyn Duke/R3/USEPA/US
Date: 07/12/2011 07:46AM
Subject: Fw: [permit] BACT -Municipal Waste Combustor Metals

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Gerallyn Duke
EPA Region III
Office of Permits & Air Toxics 3AP10
1650 Arch Street
Philadelphia, PA 19103
215-814-2084

|Re: Fw: [permit] BACT -Municipal Waste Combustor Metals |
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SO2 What are the annual emissions rates for each of these pollutants? Assuming one pollutant triggers the major source threshold, and considering the projected PSD metal emission rates (Pb - 0.13 tpy, and Hg - 07 tpy), BACT requirements for these metals would not be triggered. The significant emission rates under 40 CFR 52.21(b)(23) for these metals are: Pb - 0.6 tpy, and Hg - 0.1 tpy. Obviously, the

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In a related matter, it's important to know that EPA is drafting a revised LMWC 129 MACT proposal, to be published in the FR, perhaps this fall. [Check with Warren Johnson, OAQPS, on the estimated proposal date.] A new facility, which commences construction after the revised rule proposal date, will be subject to possibly more stringent subpart Eb MACT requirements for PM, Pb, Cd, and Hg than what is required now.

Let me know if you need a clarification on any response.

Jim T.

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|Gerallyn
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|Fw: [permit] BACT -Municipal Waste Combustor
Metals
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I'm not sure you are on this list serve, but here is a question for
you. :-)
Gerallyn Duke
EPA Region III
Office of Permits & Air Toxics 3AP10
1650 Arch Street
Philadelphia, PA 19103
215-814-2084

----- Forwarded by Gerallyn Duke/R3/USEPA/US on 07/07/2011 07:14 AM

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| From: |
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|Viorica
Petriman/R2/USEPA/US@EPA
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 |[permit] BACT -Municipal Waste Combustor
Metals
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· 97 TPY of PM2.5 (filterable + condensable)

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· 0.31 TPY of Lead (Pb), and
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_____
Total: 0.426 TPY

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Questions:

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Thank you. Any input you can provide will be greatly appreciated.

Viorica Petriman, Environmental Engineer

US EPA Region 2
Air Programs Branch
Air Permitting Section
290 Broadway, 25th Floor
New York , NY 10007
Phone: 212-637-4021
Fax:212-637-3901

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Or send a blank email to leave-1152246-1024419.8b0ed3014763d5bf908357448c8e3912@lists.epa.gov .
----- Forwarded by Robert Cheever/R7/USEPA/US on 09/08/2014 08:52 AM -----

From: Gerallyn Duke/R3/USEPA/US
To: "Air Permit Exchange" <permit@lists.epa.gov>
Date: 07/12/2011 06:45 AM
Subject: Fw: [permit] BACT -Municipal Waste Combustor Metals

I forwarded the question from Viorica in R2 to the Region III air
incinerator expert. I hope you find this helpful.
Gerallyn Duke
EPA Region III
Office of Permits & Air Toxics 3AP10
1650 Arch Street
Philadelphia, PA 19103
215-814-2084

----- Forwarded by Gerallyn Duke/R3/USEPA/US on 07/12/2011 07:35 AM

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|Mike Gordon/R3/USEPA/US@EPA, Walter Wilkie/R3/USEPA/US@EPA |
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|07/11/2011 01:37 PM |
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|Re: Fw: [permit] BACT -Municipal Waste Combustor Metals |
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Gerallyn,

It has been a while (around 2000) since I was involved in PSD applicability determinations. I'm not sure how PSD rule applicability has changed since that time. Nevertheless, given below are my responses to your questions. I hope you and R2 find the responses helpful.

1. What is the meaning of “measured as particulate matter”? Does this mean that we only set one limit for MWC metals and determine compliance with Method 5? What about PM condensable for MWC metals?

Response: PM control is a surrogate means and/or indicator for metals control. By effectively controlling PM, there is a collateral benefit in controlling most metal emissions, except Hg, which is highly volatile. The 129 rules for incinerators are clear. PM compliance is determined by M5 and heavy metals (Hg, Cd, and Pb) compliance is determined by Method 29. The compliance method exceptions include the

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Jim T.

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|Gerallyn

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|Fw: [permit] BACT -Municipal Waste Combustor
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Viorica Petriman, Environmental Engineer
US EPA Region 2
Air Programs Branch
Air Permitting Section
290 Broadway, 25th Floor
New York , NY 10007
Phone: 212-637-4021
Fax:212-637-3901

----- Forwarded by Robert Cheever/R7/USEPA/US on 09/08/2014 08:52 AM -----

From: PatriciaA Scott/R7/USEPA/US
To: Jon Knodel/R7/USEPA/US@EPA, PATRICK.ROBERT@epa.gov
Cc: Eric Sturm/R7/USEPA/US@EPA, Hugh McCullough/R7/USEPA/US@EPA, MarkA Smith/R7/USEPA/US@EPA, Robert Cheever/R7/USEPA/US@EPA, Robert Webber/R7/USEPA/US@EPA, Ward Burns/R7/USEPA/US@EPA
Date: 09/06/2011 05:14 PM
Subject: Agenda for Permits Call with NDEQ

Rescheduled for:
September 8, 2011 Room **2210C** 9:30 a.m. Call to: 402-471-4204

Please note date, time and room change

Topic #1) We are working on updating Title 129 to incorporate the definition of particulate matter emissions. Why did EPA find it necessary to change the definition of “Regulated NSR Pollutant” and not change the definition of “Regulated Air Pollutant”? The reason he asked is that we are looking at incorporating “particulate matter emissions” as a stand-alone definition vs. incorporating it into the definition of “Regulated NSR Pollutant”. If we do that, it would make the

definition directly apply to the operating permit program, which I assume it does and should, vs. just the PSD program. When I say “directly apply to the operating permit program”, I mean it would be used in applicability determinations vs. just applying when it comes to applicable requirements. In addition, if we adopt it as planned, we will likely get push-back that we are being more stringent than EPA.

My best guess is that “Regulated Air Pollutant” is defined in the CAA, so EPA is limited on what they can do with the definition. In addition, since condensables are defined in the test method and considered a part of total PM, we would have to consider condensables in the operating permit program. Of course, that logic would apply to the PSD program too.

Anyway, the way EPA has handled this issue raises the question of whether the same definition should be used for both the PSD and Title V programs. We would like EPA’s input on this.

Topic #2) Condensable PM: Does EPA intend that ambient temperature stacks (ex. grain handling baghouse or other devices where little or no CPM is present) have a limit on CPM? If there is a limit on total PM does a source have to test for CPM to demonstrate compliance with the limit?

Topic #3) Ozone requirements (NOx & VOC): does EPA expect any photochemical modeling to take place for a PSD permit? what would you expect to see as far as sending ozone through the PSD requirements?

Topic #4) We are looking at giving ADM some flexibility with their NOx limit of 0.07 lb/MMBtu from their coal combustors by making it a 12-month rolling average instead of a 30-day ave. Do we also need a short-term standard? If potential annual NOx emissions won't increase, is there any reason to do NOx modeling for the 1-hr standard?

Topic #5) Question about Central Valley Ag source grouping. CVA operates an existing grain elevator in the town of Wakefield. CVA is proposing to build another elevator just outside of town about 0.6 miles away on a little 'campus' where they are also proposing a liquid fertilizer plant and a dry fertilizer plant. They intend to fill storage at the new elevator and if it gets full then direct trucks to the old elevator. We are looking at whether the elevators are the same source or not. It seems pretty clear that the dry fert plant can be its own separate facility even though the employees at the 'complex' work at all of the 3 facilities.

Topic #6) What does EPA think of block averages vs. rolling averages. We have a power plant that has proposed a block average in their CAM plan for PM. They will be using a COM and converting the opacity readings to a block average.

----- Forwarded by Robert Cheever/R7/USEPA/US on 09/08/2014 08:52 AM -----

From: Eric Sturm/R7/USEPA/US@EPA
To: "Air Permit Exchange" <permit@lists.epa.gov>
Cc: Donald Law/R8/USEPA/US@EPA, Beth Valenziano/R5/USEPA/US@EPA
Date: 10/11/2011 11:21 AM
Subject: [permit] Order Up

Two new orders were recently signed. Both are in response to Jeremy Nichols petitioning the Excel Energy coal fired power plants in Colorado - Cherokee & Valmont. All issues were denied. Thanks for sending DJ.

http://www.epa.gov/region07/air/title5/petitiondb/petitions/xcel_cherokee_response2011.pdf
http://www.epa.gov/region07/air/title5/petitiondb/petitions/xcel_valmont_response2011.pdf

Summary
1) Compliance plan for opacity monitoring.
2) Compliance with the opacity requirements.
3) Compliance with PM limits.

4) Compliance with 112(j).
5) PSD for CO2.

In addition, two new petitions out of Michigan were added to the database. Thanks for sending Beth.

http://www.epa.gov/region07/air/title5/petitiondb/petitions/cobb_petition2011.pdf
http://www.epa.gov/region07/air/title5/petitiondb/petitions/detroit_renewable_petition2011.pdf

Regards,

Eric Sturm
Environmental Engineer | EPA | R7 Air Compliance | (P)913.551.7377 | (C)402.310.4211

----- Forwarded by Robert Cheever/R7/USEPA/US on 09/08/2014 08:52 AM -----

From: Jon Knodel/R7/USEPA/US
To: Sara HertzWu/R7/USEPA/US@EPA
Cc: MarkA Smith/R7/USEPA/US@EPA, Robert Cheever/R7/USEPA/US@EPA, Robert Patrick/R7/USEPA/US@EPA
Date: 04/03/2012 08:58 AM
Subject: Re: 4.12.DD Briefing Materials Ameren Sioux Power Plant Title V Petition.pptx

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Sara,

Thanks for pulling together the Sioux briefing presentation. I have just a few comments below. If you have any questions, please let me know.

Jon

Slide 7

• Response Option 1- Deny (preferred by workgroup):

– The testing for PM condensables is not used for compliance with the SIP limits. Instead, Ameren has agreed, at MDNR's request, to conduct periodic sampling for condensables to inform emission factors for PM2.5 modeling, fees, and other air quality purposes.
– Con: At the time the permit was issued, OTM 28 and Method 202 were deemed equivalent by EPA. In December 2011, EPA promulgated revisions to Method 202 to replace OTM 28. Therefore, OTM 28 ~~and Method 202 are currently not equivalent test methods, however,~~ **no longer exists but yet** the permit **continues to** provide~~s~~ the option to use either.

Slide 8

•Petition Allegation

–The permit requires Ameren to conduct stack testing for both filterable and condensable PM within one year of permit issuance and Method 202 or OTM 28 can be used. Repeat stack tests must be conducted every three years, but ~~does~~ permit does not specify testing methods.

•MDNR Response to Comments

–No response to the comment, although MDNR issued a permit amendment ~~in June~~ **on May 13,** 2011, that clarified that Method 202 and OTM28 should be used for the repeat stack testing methods.

Slide 10

•Petition Allegation:

–Margin of compliance: The margin of compliance, **in this case,** is a measure of how close Ameren is to the **SIP-based** PM ~~standard~~ **emission limitation** when it exceeds the opacity requirements **(e.g. boilers are opacity limited)**.

Slide 17

Did we intend to have a "Grant" option or just defer to Allegation 5?

Slide 23

•Response Option 2-Grant:

–Missouri did not adequately respond to the comment and the permit should specify which monitoring option the source should use.

–Con: 40 CFR Part 75 provides four monitoring options ~~form~~ **from** which a source can choose its CO2 monitoring method. EPA does not specify in the Title IV permit which method must be used, nor should the Title V permit ~~specify the method~~.

Sara HertzWu---04/02/2012 03:58:08 PM---Thanks to all of you for your helpful comments today. I hopefully have captured all of the comments

From: Sara HertzWu/R7/USEPA/US
To: Robert Patrick/R7/USEPA/US@EPA, Robert Cheever/R7/USEPA/US@EPA, Jon Knodel/R7/USEPA/US@EPA
Cc: MarkA Smith/R7/USEPA/US@EPA
Date: 04/02/2012 03:58 PM
Subject: 4.12.DD Briefing Materials Ameren Sioux Power Plant Title V Petition.pptx

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Thanks to all of you for your helpful comments today. I hopefully have captured all of the comments in the revised power point. I also saved it to the H drive. Please let me know if you have any additional revisions. We will shoot to send this to the workgroup by COB Wednesday (or sooner).

Thanks!

Sara Hertz Wu
Assistant Regional Counsel
U.S. EPA, Region 7
Office of Regional Counsel
901 N. 5th Street
Kansas City, Kansas 66101

Phone: (913) 551-7316
Fax: (913) 551-7925
Email: HertzWu.Sara@epa.gov

[attachment "4.12.DD Briefing Materials Ameren Sioux Power Plant Title V Petition.pptx" deleted by Jon Knodel/R7/USEPA/US]